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June 6, 2011

(Via E-File)

Hon. Esther Salas, U.S.M.J.
U.S. District Court of NJ
Martin Luther King Jr., Federal Building
50 Walnut Street
Newark, New Jersey 07102

**Re: Santa Lucia v. McClain & Co., et als.
Civil Action No.: 11-cv-930**

**Frank Bruno, et al. v. McClain & Co., et als.
Civil Action No.: 11-cv-931**

Dear Judge Salas:

This office and the law office of Hyderally & Associates jointly represent the Plaintiffs in the above-entitled matters. We write to briefly respond to Ms. Hatfield's letter that was e-filed today.

Following our meeting with Ms. Hatfield on Friday, June 3, 2011, I called her within an hour of leaving her office. During our phone conference, I advised that I spoke with Mr. Hyderally and that we desired to go forward with the global settlement conference scheduled for June 14, 2011. Specifically, I advised that this was a significant case for plaintiffs; that we did not want to "re-adourn" this matter before Your Honor; and that we were prepared to dedicate the resources necessary to crunch our damages this week. I advised that we would put as many persons necessary to complete this task in order to avoid a second adjournment.

I also indicated that we would **not** interfere with her adjournment request, but wanted our position to be known with the Court that we preferred to proceed with the settlement conference. As an alternative, we suggested that we proceed



with a settlement conference for plaintiff Michael Santa Lucia only, civil action number 11-cv-930. We felt that it may be more feasible for all parties to analyze the damages of one (1) plaintiff this week, as opposed to five (5) plaintiffs collectively. We also advised counsel that plaintiff Santa Lucia has a pre-booked flight from Florida to New Jersey in order to be present for mediation.

We are prepared to proceed with the global settlement conference if Your Honor desires, or in the alternative a settlement conference addressing plaintiff Santa Lucia only. All of the plaintiffs have prepared for mediation and set time aside to be present for the settlement conference.

We respectfully leave it within the Court's discretion to decide how to proceed with the June 14th conference. We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ John J. Zidziunas

JOHN J. ZIDZIUNAS
For the Firm

C: Ty Hyderally, Esq. (via e-file)
Kathryn V. Hatfield, Esq. (via e-file)